



July 19, 2018

Via ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Subject: *Notice of ex parte presentations
CAF Performance Metrics (WC Docket No. 10-90)*

Dear Ms. Dortch:

On July 18, 2018, Pradman Kaul, President of Hughes Network Systems, LLC ("Hughes"), Paul Gaske, Executive Vice President and General Manager, North America for Hughes, and I spoke by telephone with Jay Schwarz of the Office of Chairman Pai regarding the *Bureau Order* in the above-captioned docket setting performance metrics for CAF support recipients.¹ On the call, we expressed concern regarding the *Bureau Order's* decision to require CAF recipients in the higher-latency tier to meet live "conversation-opinion" tests under the Commission's requirement that bidders in the higher-latency tier demonstrate a mean opinion score ("MOS") of 4.² We emphasized that Hughes is capable of meeting a MOS 4 requirement under the ITU-T Recommendation P.800 standard adopted by the full Commission,³ and urged the Commission to recognize the listening-opinion test set out in that standard.⁴ Our arguments were consistent with those explained in my letter of July 16, 2017 in this docket.⁵

Please direct any questions regarding this filing to the undersigned.

Sincerely,

/s/

Jennifer A. Manner
Senior Vice President, Regulatory Affairs

cc: Jay Schwarz

¹ *Connect America Fund*, Order, DA 18-710 (WCB, WTB, and OET, rel. July 6, 2018) ("*Bureau Order*").

² *Id.* at ¶¶ 44-46.

³ *Connect America Fund, et al*, Report and Order and Further Notice of Proposed Rulemaking, 31 FCC Rcd 5949, 5957 ¶ 15 (2016).

⁴ ITU-T P.800, Methods for Subjective Determination of Transmission Quality (Aug. 1996), at 4 & Annex B.

⁵ Letter from Jennifer A. Manner, Hughes, to Marlene H. Dortch, FCC, WC Docket No. 10-90 (filed March 16, 2018).